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Attorney for Petitioner **David Nosal**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID NOSAL,

Defendant.

Case No. CR 08-0237 EMC

**SUPPLEMENT TO MOTION FOR EARLY
TERMINATION OF SUPERVISED
RELEASE REGARDING CONTINUED
COMMUNITY SERVICE**

Hon. Edward M. Chen

Date: TBD
Time: TBD

SUPPLEMENTAL ARGUMENT

As part of his sentence, this Court ordered Mr. Nosal to complete 400 hours of community service. As stated in the moving papers, Mr. Nosal has currently completed approximately half of the required hours. At the time the motion was filed, Mr. Nosal was unable to complete his hours at the food bank where he had been working due to the imposition of the shelter in place order.

On May 9, 2020, Mr. Nosal contacted Charles Beyer, the volunteer manager at the Alameda County Community Food Bank, to ask whether the food bank was open and if Mr. Nosal could

SUPPLEMENT TO MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE REGARDING
CONTINUED COMMUNITY SERVICE

United States v. Nosal;
Case No. 08-cr-00237-EMC

1 continue his community service work. Mr. Beyer responded on May 12, 2020 and indicated that the
2 food bank would likely not open until sometime in June at the earliest. Mr. Beyer did not have a
3 specific date at that time.

4 Acting through counsel, Mr. Nosal filed his motion on May 26, 2020, in which he explained
5 that the Covid-19 pandemic and the attendant shelter in place order were preventing him from
6 continuing the work. On Saturday, May 30, 2020, Mr. Nosal received word from Mr. Beyer that the
7 food bank would reopen and indicated they would need someone to work from 7:30 a.m. to 2:00
8 p.m. for the next four to six weeks. Mr. Nosal immediately agreed.

9 As of today, June 1, 2020, Mr. Nosal has resumed volunteering at the Alameda County
10 Community Food Bank. He will be working every weekday for the next five weeks in order to
11 dutifully and expeditiously complete his community service.

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13 Respectfully submitted,

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15 Dated: June 1, 2020

By:

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STEVEN F. GRUEL, ESQ.
Attorney for **DAVID NOSAL**

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24 SUPPLEMENT TO MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE REGARDING
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25 *United States v. Nosal*;
Case No. 08-cr-00237-EMC